

Mountain Vistas Specific Plan And Environmental Impact Report

Part IV: Final EIR

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MOUNTAIN VISTAS SPECIFIC PLAN AND ENVIRONMENTAL IMPACT REPORT

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I. INTRODUCTION

INTRODUCTION

The Final EIR contains the response to comments received on the Draft Environmental Impact Report (DEIR) for the Mountain Vistas Specific Plan. The DEIR is incorporated herein by reference. The Mitigation Monitoring Plan for the Mountain Vistas Specific Plan is included in the Final EIR as Appendix A.

The Final EIR documents are available for the cost of reproduction from the Mono County Community Development Department offices in Bridgeport, (760) 932-5420, or Mammoth Lakes, (760) 924-1800.

CONTENTS OF THE FINAL EIR

In compliance with CEQA requirements, the Final EIR for Mountain Vistas Specific Plan includes the following:

- (a) The Draft EIR or a revision of the Draft.
- (b) Comments and recommendations received on the Draft EIR, either verbatim or in summary.
- (c) ©A list of persons, organizations, and public agencies commenting on the Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency.
(CEQA Guidelines Section 15132)

FINAL EIR PROCESS

The Draft EIR for the Mountain Vistas Specific Plan was circulated for public comment from July 6, 2005 through August 29, 2005. Twelve comments were received.

The Final EIR must be certified before Mono County (as Lead Agency taking action on the project) can approve the Mountain Vistas Specific Plan. In order to certify the Final EIR, the Lead Agency must conclude that:

- (1) The Final EIR has been completed in compliance with CEQA;
- (2) The Final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the project; and,
- (3) The Final EIR reflects the lead agency's independent judgment and analysis.
(CEQA Guidelines Section 15090)

After the Final EIR is certified, the Lead Agency files a Notice of Completion, starting a 30-day statute of limitations period under CEQA for challenging the approval of the Final EIR.

Where environmental effects have been identified as significant in an EIR and the Lead Agency intends to approve the project, the Lead Agency must prepare written findings on each environmental impact identified as significant. Findings must include a brief explanation of the rationale for each finding. The possible findings are:

- (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
 - (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
 - (3) Specific economic, legal, social, technological, or other considerations, including provision of project alternatives identified in the Final EIR.
- (CEQA Guidelines Section 15091)

When making findings to support (1) above, a mitigation monitoring program must be included in the Final EIR to ensure CEQA compliance during project implementation. A proposed mitigation monitoring program for the Mountain Vistas Specific Plan is included in Appendix A.

II. COMMENTS & RESPONSES

PERSONS & ORGANIZATIONS COMMENTING ON THE DRAFT EIR

Comments on the DEIR were received from the following entities:

1. Bureau of Land Management (Bishop);
2. California Department of Fish and Game (Bishop);
3. California Department of Transportation (Bishop);
4. Great Basin Unified Air Pollution Control District (Bishop);
5. Los Angeles Department of Water and Power (Bishop);
6. Geri Bassett (Chalfant);
7. Daniel and Yvonne Froiland (Chalfant);
8. Mike McWilliams (White Mountain Estates);
9. Margaret Miller (Chalfant);
10. Janet Perry (Chalfant);
11. Stephen and Dee Reish (Chalfant); and
12. Don and Annette Sebastian (Chalfant).

The comment letters are reprinted in their entirety in Appendix B.

KEY POINTS RAISED IN COMMENTS

Comments on the DEIR addressed the following key points:

1. Bureau of Land Management (Bishop)

- a. Recreation uses and impacts are expected to occur on BLM land around the proposed community. New trail development is expected from residents who ride horses through LADWP land onto BLM land. This creates an additional management burden and cost for public lands management around surrounding communities. This problem currently occurs around existing homes in the area. The letter proposes mitigation to address this issue.
- b. Animal feed related to stock use has the potential to spread weeds onto nearby public lands, altering its natural desert scrub habitat. Cross-country horseback riding increases weed seed dispersal. The letter proposes mitigation to address this issue.
- c. The comment provides information on the relationship between groundwater in the area and Fish Slough and concludes that:

“The circumstantial case for a relationship between groundwater availability in the Hammil and Chalfant Valley areas and amount of discharge of water in Fish Slough appears to be demonstrated.”

The letter proposes mitigation to assess the maximum safe yield of groundwater pumping and that the maximum safe yield be made a condition for project approval.

- d. In consideration of the potential for this project and future projects of a similar type in the Chalfant area to have effects on groundwater in the surrounding environment, the BLM asks for clarification/response on a number of statements concerning groundwater in the DEIR.

2. California Department of Fish and Game (Bishop)

- a. While the information in the DEIR on Swainson's hawk is generally correct—they have been known to nest in the vicinity of the project site but have not been found on the project site—this does not preclude the potential for them to nest on the project site. The Department suggests that appropriate nesting surveys should be required to ensure that potential impacts to Swainson's hawk are less than significant.
- b. The Department has concerns regarding the adequacy of the analysis of the potential impacts of increased groundwater pumping on springs and wetlands and wetland dependent species at Fish Slough.
- c. The Department has concerns with the adequacy of the analysis of potential impacts to water resources, particularly groundwater, and does not feel that the proposed mitigation is adequate.

3. California Department of Transportation (Bishop)

- a. The Department finds the "Mono Alternative", Exhibit 5C, to be the preferable off-site access improvement alternative.
- b. The Department provides information concerning design details of the off-site access improvements and states that the applicant would only be responsible for improvements on the west side of the highway.
- c. Both metric and U.S. standard units are used on plan sheets; it would be more convenient if all U.S. standard units were used.
- d. The comment notes a number of requirements pertaining to Highway 6 and its right-of-way that may pertain to the project depending on its final design.

4. Great Basin Unified Air Pollution Control District (Bishop)

- a. The Mountain Vistas Specific Plan will be subject to the District's Secondary Source Permitting requirements (Rule 216), as noted in the project documents.
- b. The District is primarily concerned with the potential for fugitive dust caused nuisance violations. The District suggests a number of additional dust mitigation measures for inclusion in the EIR.

5. Los Angeles Department of Water and Power (Bishop)

- a. The comment requests further clarification on the drainage easement between lots 32 and 33. What facilities are planned for the easement and how does it impact adjacent LADWP property?
- b. The Department is concerned about the impact to its adjacent property from the equestrian easement on the western lots. The comment notes that there is no guarantee that the LADWP property will always be accessible for recreational uses.

6. Geri Bassett (Chalfant)

- a. The comment questions the last bullet in the “Purpose Statement” that states that one of the specific project objectives is:

“Providing additional infill development along Hwy. 6, at a greater single-family density, in order to help develop a “Main Street” along Hwy. 6 through the community of Chalfant.”

The comment states that the proposed development will not achieve this goal and this goal is not in the current General Plan for Chalfant and was not proposed at the General Plan Amendment meetings.

- b. The comment questions whether the project will preserve the rural character and setting of Chalfant and suggests that some of the lots should be sold as bare land so homeowners could build individual houses.
- c. How is the required 65 percent xeriscaping is going to be achieved given how much lawn is shown in the housing prototype figures and how will the landscaping requirement be enforced once the property is sold?
- d. The comment addresses the need for affordable housing and states that supplying only two units out of the 47 proposed units as affordable housing is not “a percentage worth considering”.
- e. The animal standards should be the same as for existing housing areas. Otherwise, there will be more enforcement issues and complaints about animals.
- f. Who will be responsible for maintenance of the onsite infrastructure and landscaping if the homeowners association does not follow through on its obligations?
- g. Are there other wildlife impacts that need analysis along the Highway 6 corridor, such as impacts to Fish Slough?
- h. There should be more current information about the status of the groundwater aquifer before a development of this size is approved. The EIR references reports from 1983, 1979, and 2001.
- i. The project estimates a 25 percent increase in the population of Chalfant but there is no way to ensure that there will be a corresponding increase in the number of people willing to serve on the Fire Department or as emergency medical personnel. Contributing a fair share towards the cost of additional equipment and facilities does not address the issue of extra personnel or long-term impacts to emergency services.
- j. At a 2004 RPAC meeting, Rich McAteer indicated that the County and the ESUSD had not done the necessary paperwork to increase the school impact fees to keep up with current needs. Has this been resolved? If not, the school fees should be increased for this development.
- k. The comment letter prefers Development Alternative B—Reduced Development, 26 one-acre lots and Circulation Alternative 5B. The letter also states that the recreation impact fees should go to improving the existing park rather than adding an additional park.

7. Daniel and Yvonne Froiland (Chalfant)

- a. The comment expresses concern about the amount of development planned and its impact on groundwater in the area.
- b. The comment also addresses the possibility of contamination of well water from the proposed septic systems.

8. Mike McWilliams (White Mountain Estates)

- a. The comment discusses traffic speeds on Highway 6 in Chalfant and suggests a reduced speed limit through the community.
- b. The comment also addresses affordable housing and higher densities.

9. Margaret Miller (Chalfant)

- a. The General Plan requirement is for one-acre parcels on the project site.
- b. The comment questions the adequacy of the water study, whether the high-density housing will contaminate existing wells, and asks whether the project proponent is going to install a complete community water system.
- c. The comment asks about the size and location of the propane tanks, about precautions against leaks and explosions, and why the development is using communal propane tanks instead of individual tanks.
- d. Roads need to be sized appropriately to accommodate emergency vehicles.
- e. What provisions have been made to address additional impacts on public services (sheriff, traffic to transfer station, phone lines, social services, mail delivery, animal control, fire protection and EMTs)?

10. Janet Perry (Chalfant)

- a. The comment contains a number of points that address development in the Chalfant Valley community in general. Only comments that pertain to the Mountain Vistas Specific Plan are addressed here.
- b. The comment addresses a number of points pertaining to the design of the Mountain Vistas subdivision, i.e.:
 - 1. Parcels should be no smaller than one acre.
 - 2. There should not be manufactured homes on all the lots.
 - 3. The development should fit into the existing environment and not look like a subdivision.
 - 4. Livestock should be encouraged.
 - 5. There should be an underground pedestrian/equestrian/OHV access under Highway 6.
- c. There needs to be a complete study of the aquifer.
- d. There is not presently enough fire protection/EMT coverage in Chalfant.
- e. Is a potential increase in crime addressed?
- f. Additional school monies should be used to improve the Benton school—building a school in Chalfant would hurt the ADA in Benton. Parents from Chalfant south should be allowed to choose between the schools in Benton and Bishop.

11. Stephen and Dee Reish (Chalfant)

- a. Roads into the development need to provide access for emergency vehicles.
- b. One-acre parcels are necessary to prevent soil saturation from sewage and possible groundwater contamination.
- c. Additional study of the aquifer in the area is necessary before additional development occurs.

12. Don and Annette Sebastian (Chalfant)

- a. One-acre lots have been recommended in the past by the RPAC for all new development in Chalfant. Smaller size lots will hasten septic contamination of the groundwater supply.
- b. The developer has presented only one plan.
- c. The central gas tanks are not safe.

RESPONSE TO COMMENTS

Responses to the comments are presented in this section. Each comment is followed by its response.

1. Bureau of Land Management (Bishop)

Comment 1a: Recreational uses and impacts are expected to occur on BLM land around the proposed community. New trail development is expected from residents who ride horses through LADWP land onto BLM land. This creates an additional management burden and cost for public lands management around surrounding communities. This problem currently occurs around existing homes in the area. The letter proposes mitigation to address this issue.

Response 1a: The mitigation proposed in the letter has been added to the EIR (and to the corresponding standard and/or policy section in the Specific Plan), i.e.:

VW-7 The project proponent shall work with LADWP and BLM to identify one authorized trail/route access from the community to access adjacent LADWP and BLM lands. The route shall be identified prior to approval of the final tract map and shall be marked with a sign at the property boundary. The developer shall inform all new residents of BLM policies that prohibit cross-country vehicle use on adjacent public lands and limit that vehicle use to designated roads and trails.

Comment 1b: Animal feed related to stock use has the potential to spread weeds onto nearby public lands, altering its natural desert scrub habitat. Cross-country horseback riding increases weed seed dispersal. The one authorized trail/route into adjoining lands, proposed in the previous comment, would reduce and confine the dispersal of weed seed. The letter proposes additional mitigation to further mitigate the potential impact.

Response 1b: The mitigation proposed in the letter has been added to the EIR (and to the corresponding standard and/or policy section in the Specific Plan), i.e.:

VW-8 The developer shall notify all equestrian related property residents of the effects of equine related weed dispersal and encourage all residents to use certified weed free feed.

Comment 1c: The comment provides information on the relationship between groundwater in the area and Fish Slough and concludes that:

“The circumstantial case for a relationship between groundwater availability in the Hammil and Chalfant Valley areas and amount of discharge of water in Fish Slough appears to be demonstrated.”

The comment also addresses the potential for water “mining” onsite. The BLM proposes mitigation to assess the maximum safe yield of groundwater pumping and suggests that the maximum safe yield be made a condition for project approval.

Response 1c: Richard Slade & Associates LLC, Consulting Groundwater Geologists, provided additional comments about hydrogeological conditions in the area to supplement and clarify the information contained in the Water Well Feasibility and Siting Study they prepared for the project. The additional comments compiled by Slade & Associates were peer reviewed by AMEC Earth and Environmental Inc. to ensure an impartial analysis. AMEC concluded that:

“The RCS memorandum dated October 18, 2005, appears to contain sufficient information to support the opinions made by RCS regarding the potential impacts to water resources associated with the proposed project.”

Slade provided the following additional figures to supplement their hydrogeologic comments:

- Figure 1, “Location Map;” this map identifies the boundaries of the subject development, provides the locations of the two older, existing onsite wells (a domestic- and an agricultural-supply well), and illustrates the locations of two nearby but offsite wells that were recently sited, constructed and tested by RCS for that other property. Data from that well testing has been utilized for this project as discussed below.
- Figure 2, “Geology Map;” this map has been adapted from regional geologic field mapping by D.F. Crowder and M.F. Sheridan (1972 USGS publication titled, “Geologic Map of the White Mountain Peak Quadrangle, Mono County, CA). Figure 2 illustrates geologic conditions at ground surface throughout Chalfant Valley and areas to the west, including geologic conditions at/near Fish Slough. The boundaries of the proposed Mountain Vistas project (Specific Plan Area) are shown on the map for reference.
- Figure 3, “Modeled Groundwater Elevation Contour Map;” this map has been adapted from Figure 6-12 in the March 9, 2001 report titled, “Task 1 Report, Preliminary Data Collection and Hydrogeologic Models for the US Filter Tri-Valley Surplus Groundwater Program, Mono County, CA,” prepared by MHA Environmental Consulting, Inc. (MHA). Figure 3 illustrates the regional groundwater flow direction within Chalfant Valley, based on computer modeling by MHA.

Slade provided the following response concerning issues regarding Fish Slough Springs:

“It is our opinion that future groundwater extraction from wells at the proposed Mountain Vistas development will not create any adverse effect(s) on these spring(s). Key reasons for our professional opinion are as follows:

1. Distance Between Sites – Figure 1 shows that Fish Slough is located 1.7 miles to the southwest of the southwestern-most corner of the subject property boundary. Because the distance between the proposed wells and Fish Slough is great, it is highly unlikely that the proposed pumping of the new onsite wells will have any impact on the spring flows.

Differences in Geology – As shown on Figure 2, geological formations, from youngest to oldest, that are considered to underlie the subject property, include: alluvium, comprised of silt, sand and gravel; the Bishop tuff (it is possible, but unknown if the Bishop tuff would be encountered when drilling a well at the proposed development); and older alluvium, that underlies the Bishop tuff, and may

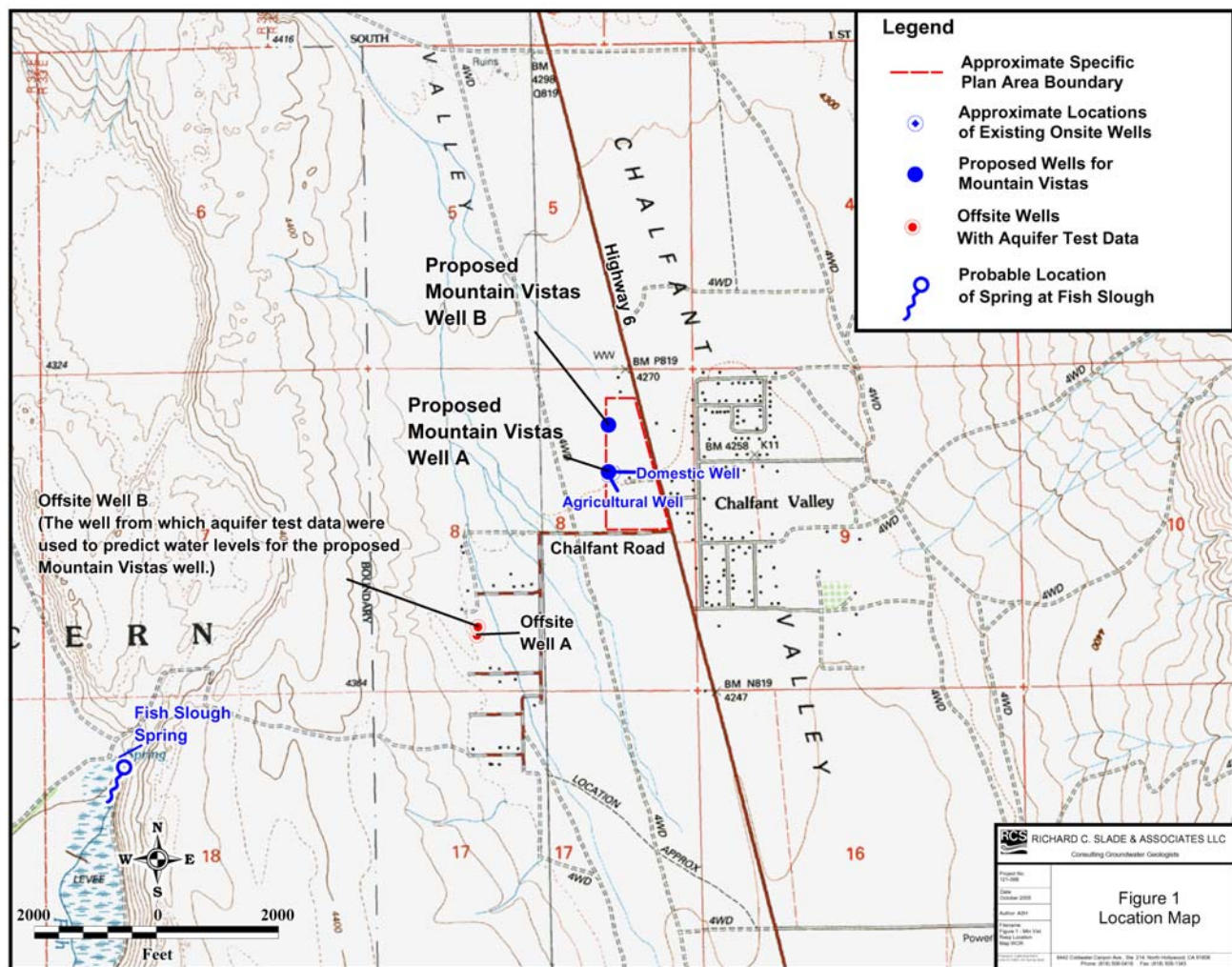


Figure 1 Location Map

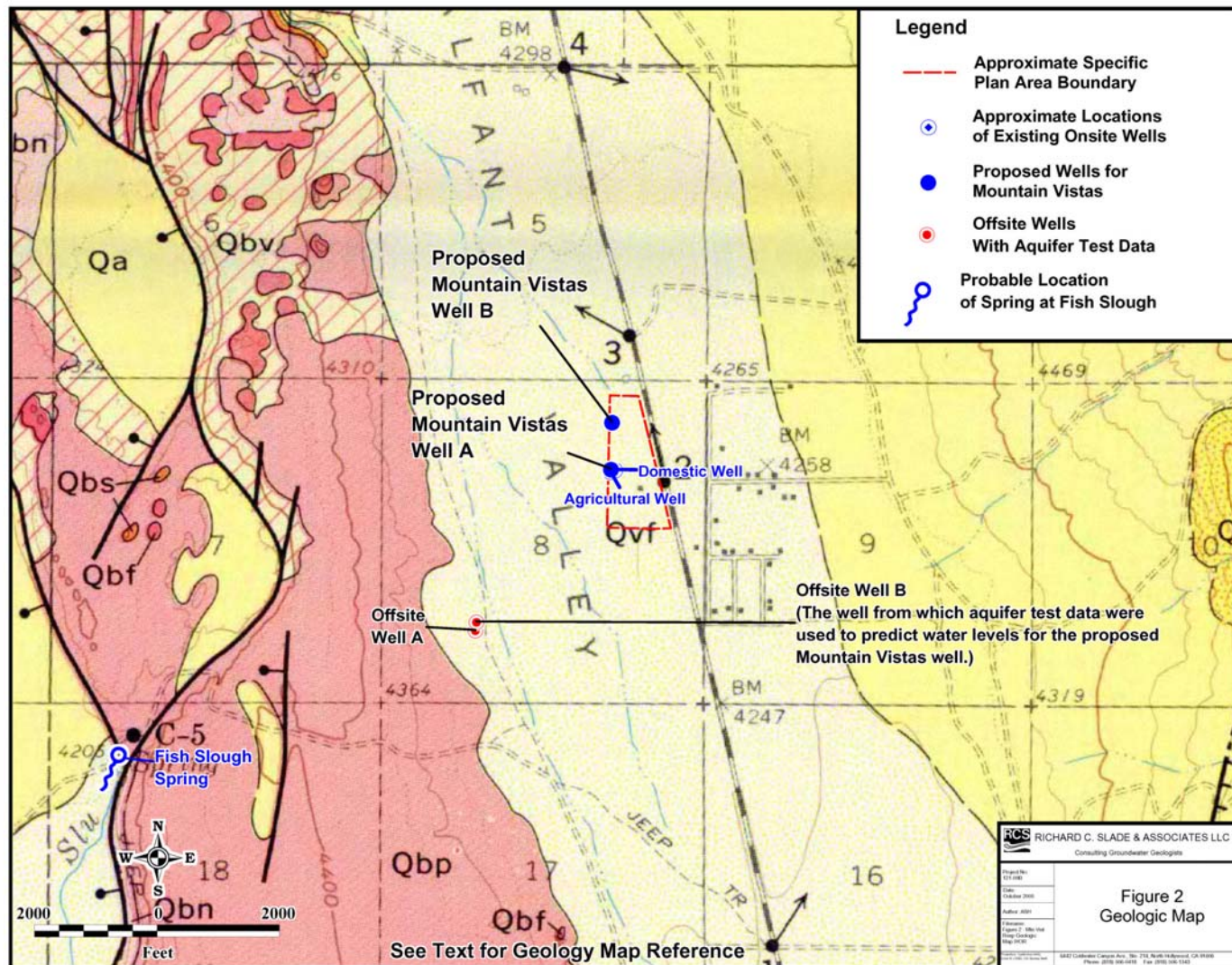


Figure 2 Geology Map

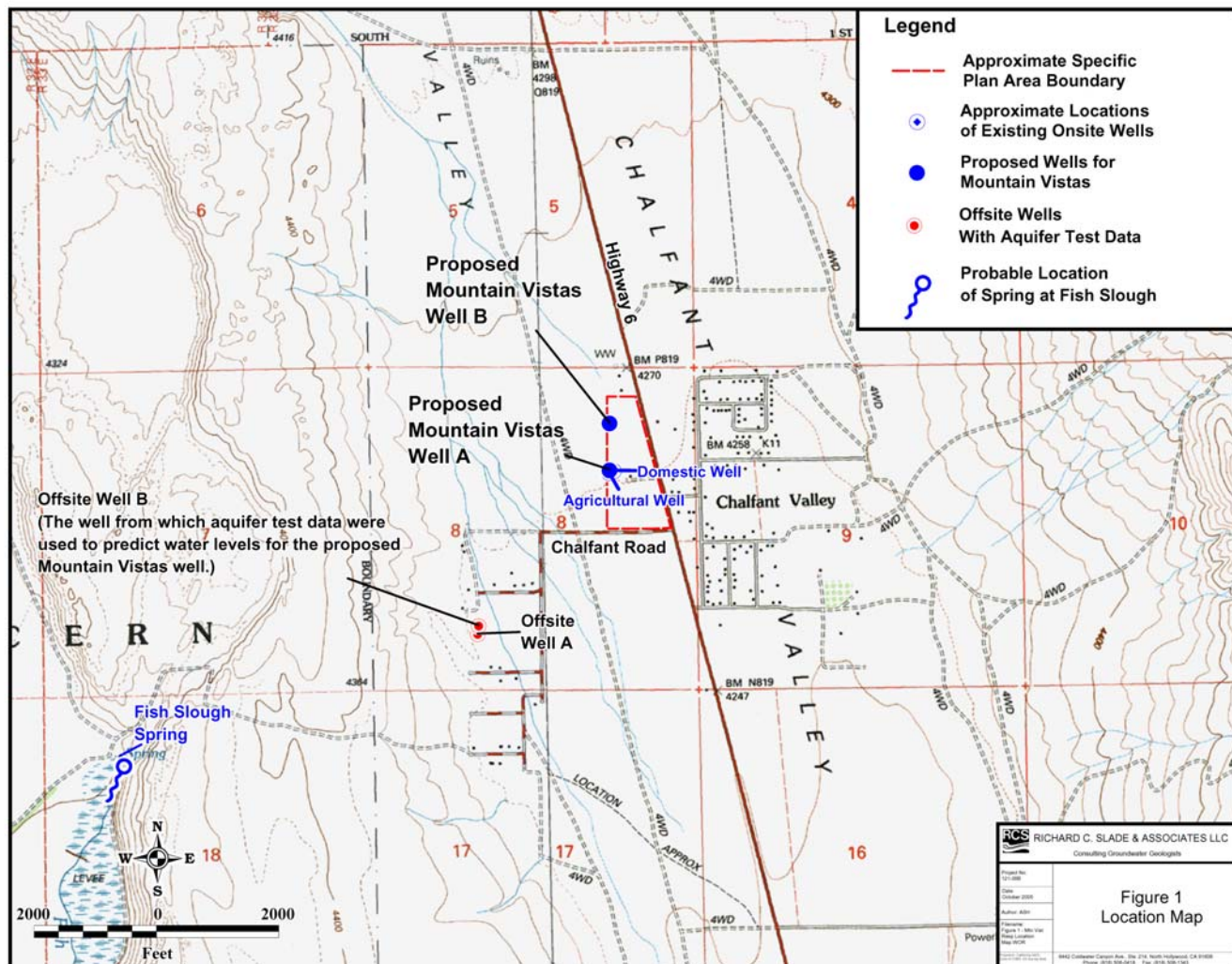


Figure 3 Modeled Groundwater Elevation Contour Map

also be interfingered with a portion of the Bishop tuff on the western portion of the Chalfant Valley. (For a more complete description of the geology in the area of the subject property, please refer to the referenced 2004 RCS report).

Recently, RCS was involved in the siting and design of two new offsite water wells just west of the proposed development (see Figure 1). These wells were designed to produce groundwater at roughly similar rates and volumes as those required for the proposed Mountain Vistas development. The boreholes for both of these new offsite wells were drilled through the young alluvium and the Bishop tuff and into the underlying older alluvium. Further, the two new offsite wells were provided with casing perforations solely within the older alluvium.

Based on the success of these two new offsite wells, it is our opinion that new wells at the proposed Mountain Vistas development would be constructed to similar depths, and into the same geologic formations as these nearby, recently constructed offsite wells. Specifically, it is our opinion that the proposed Mountain Vistas development wells would be constructed into the older alluvium beneath the site, and would be perforated solely within the older alluvium. Hence, because the new onsite wells will very likely not be perforated within the Bishop tuff, there should be no impacts at the Fish Slough spring, which lies solely within rocks of the Bishop tuff and at a distance of 1.7 miles from the subject property.

More specifically, and based on Figure 2, the spring(s) at Fish Slough originate solely within the Bishop tuff, a solidified volcanic ash-type type rock. Also, the geologic map shows several faults in the area of the spring(s). In fact, the spring(s) appear to originate roughly at the intersection of two mapped faults. These faults are part of a larger fault zone which is comprised by numerous faults (mapped by others) within the Bishop tuff; as seen on Figure 2 all of these faults trend in a general north-south orientation. Therefore, the spring(s) are fault-controlled and solely within the Bishop tuff; as a result, the springs are fed primarily by groundwater that travels within a fault-fractured portion of the Bishop tuff.

Hence, because the proposed Mountain Vistas wells will very likely be perforated solely within the alluvial deposits, because the Fish Slough spring lies a distant 1.7 miles to the west, and because the Fish Slough springs originate in the faulted portions of the Bishop tuff rocks, then it is highly unlikely that pumping of the wells proposed at the Mountain Vistas development will adversely affect the flow of these distant offsite springs.

2. Faulting – As discussed above, Fish Slough is located near the juxtaposition of well-defined faults mapped by others. Because fault movements over time can create a fine-grained material known as gouge along the fault plane, faults can act as groundwater barriers. These zones of fine-grained material can impede the flow of groundwater across a fault, therefore, effectively creating a groundwater barrier. Hence, the springs are considered to be hydraulically isolated from the alluvial sediments of the Chalfant Valley and the proposed wells at the new development.

3. Groundwater Flow Directions. Figure 3, “Modeled Groundwater Elevation Contour Map,” has been adapted from Figure 6-12 of the MHA report dated March 9, 2001, to show the calibrated model estimates of groundwater elevations in the Chalfant Valley area. RCS has plotted the approximate locations of the subject

property and of Fish Slough on Figure 3 (the map scale is roughly 1"=2.3 miles). Based on those modeled groundwater elevations contours, the regional direction of groundwater flow is from north to south across the Chalfant Valley. Hence, there is no groundwater flow from the subject property to Fish Slough. In addition, the modeled contours suggest groundwater recharge to Fish Slough is not from the Chalfant Valley area but rather from areas upgradient and to the northwest of those springs."

The following response provided by Richard Slade & Associates LLC, Consulting Groundwater Geologists concludes that water "mining" will not occur onsite.

"Issues Regarding Groundwater in Storage. In the BLM letter, a reference is made to the possibility that groundwater "mining" may occur due to the pumping of groundwater at the proposed mountain Vistas development. However, the proposed Mountain Vistas property will have a yearly groundwater demand of only 56 AF. This volume is only roughly 8 to 10% of the volume of groundwater in storage (using water level data for August 2004) solely beneath the subject property. (These figures are presented in our 2004 RCS report, page 21, under point No. 5, "Groundwater in Storage.")

In summary, the static water level in the area of the proposed development was measured in various wells on and around the property in August 2004 to be on the order of 50 ft below ground surface (ft bgs). Based on the geology encountered in recently drilled, RCS-designed offsite wells, and on published geologic mapping of the area, the Bishop tuff may or may not exist beneath the subject property. Therefore, we assume that alluvial-type deposits primarily exist below the subject property, to a depth of at least 250 to 300 ft bgs (the approximate depth to which the proposed onsite wells would likely be constructed).

Taking into consideration the Specific Plan area of 29 acres, and that, based on the August 2004 static water level in the area, at least 200 to 250 ft of saturated sediments exist beneath that area. We assume a specific yield for the sediments of 10% (see our 2004 referenced report). Hence, groundwater in storage solely beneath the property is calculated to be: (29 acres)(200 ft to 250 ft of saturated sediments)(10% specific yield). The result is a total volume of saturated sediments beneath the property (based on August 2004 water levels) on the order of 580 to 725 acre-feet (AF). Therefore, the estimated average annual water demand of the proposed Mountain Vistas development of 56 AF is only 8 to 10% of the groundwater in storage solely beneath the 29-acre Specific Plan area. This calculation does not include the annual recharge to groundwater beneath the site, or any of the subsurface groundwater inflow from areas to the north of the subject property. Further, this calculation is a conservative estimate, based on the great likelihood that there is more than 200 to 250 ft of saturated sediments below the 29-acre Specific Plan area.

It is also noteworthy that the 56 AF of annual groundwater production for the proposed development is not all used consumptively. The majority of the annual water demand for each future house will be used for landscape irrigation and for discharge to the subsurface septic system. It is known that portions of both the landscape irrigation and the water discharged to the septic system will recharge the groundwater. Hence, some of the 56 AF of annual water use has the potential to eventually recharge the groundwater beneath the property.

Further, the aquifer below the site will experience yearly recharge from groundwater inflow from the north and northeast, and also possibly from direct precipitation onto the land surface of this property. Hence, the groundwater in storage beneath the property is not a fixed volume; recharge occurs on an annual basis from both natural and man-made sources. Although RCS has made no independent calculation to quantify the annual volumes of subsurface inflow and/or recharge from areas to the north and northeast of the subject property within Chalfant Valley, it is our opinion that the groundwater pumped from beneath the site is substantially less than even the margins of error for all hydrogeologic values used for the calculations. Therefore, it is highly unlikely that groundwater “mining” will occur, as a result of the groundwater production from new wells at the proposed Mountain Vistas development.”

Comment 1d: In consideration of the potential for this project and future projects of a similar type in the Chalfant area to have effects on groundwater in the surrounding environment, the BLM asks for clarification/response on a number of statements concerning groundwater in the DEIR, i.e.:

“At page I-36, Water Resources, CS-34; Please define which “off-site wells shall be monitored during and after the pump test”. Will the monitoring be continuous during the pump test or spot reads taken at time increments and why? Will a recharge rate be determined on all monitored wells, and if not, why? Please define what “possible impacts to the aquifer” will be investigated with the pump test data and how will this information be used in determining maximum safe yield for pumping that does not create mining of water from the aquifer? We request that you provide this office with a graphic or narrative explanation for the “cone of depression showing the distance at which wells could be affected by pumping at the project site” as provided by the engineer.

At page I-37, Water Resources, CS-36; Please define what would be “significant..short term” and “significant.. long term” impacts to the underlying aquifer or to the surrounding existing wells.”

Response 1d: The following response provided by Richard Slade & Associates LLC, Consulting Groundwater Geologists addresses issues related to offsite wells and monitoring of the onsite wells.

“Issues Regarding Offsite Wells. Both the F&G letter and the BLM letter question whether or not the proposed Mountain Vistas wells will impact offsite wells owned by others that are located near the proposed wells. Figure 5 of the referenced 2004 RCS report shows the probable locations of offsite wells near the proposed site. As listed in that 2004 report, the nearest probable offsite well to either of the proposed Mountain Vistas wells is located approximately 550 feet to the north of proposed Mountain Vistas Well B. It is our opinion that the water level drawdown effects, if any, on these existing but offsite wells owned by others, as a result of the pumping required by new wells at Mountain Vistas, will be insignificant, for the following reasons:

1. Well Construction of Offsite Wells – As reported in our 2004 RCS report, a representative of Workforce Homebuilders, Inc. (Workforce) collected a few drillers’ logs for wells in the area of the proposed development. The locations of those wells for which logs were collected, and a summary of the information gleaned from those

logs, are provided on Figure 5 and Table 1 of our referenced report, respectively. In summary, the wells for which logs were collected ranged in depth from 95 to 220 feet. Because the proposed onsite wells will likely be perforated at depths of approximately 250 feet or deeper, there should be no overlap of these perforations with the offsite, privately-owned wells which are both shallower and have shallower perforation intervals.

2. Theoretical Water Level Drawdown Interference – To assess the possible drawdown effects that might be caused by pumping at the proposed Mountain Vistas wells, a theoretical model was used. As mentioned above, RCS was involved in the siting, design, and testing of water wells constructed on a nearby property (see Figure 1 for the locations of these tested wells relative to the locations of the proposed onsite wells).

The principal pumping (aquifer) test in the offsite wells to the west was conducted by RCS in November 2004, and consisted of a constant rate test during which one of the wells was pumped at an average rate of 99 gpm for a continuous period of 72 hours, whereas the other well was used only for water level monitoring (note, this 99-gpm rate was greatly in excess of the instantaneous flow rate required for that project). Water levels during the test were automatically recorded in the pumping well and in the other newly-constructed, onsite well using pressure transducers. At this pumping rate, only about 7 ft of maximum water level drawdown was recorded in the pumping well at the end of the pumping test; less than 1½ ft of water level drawdown was monitored in the onsite monitoring well which was located about 150 ft to the south. The specific capacity of the pumping well was calculated to be nearly 14 gpm per foot of drawdown.

Using the test results for these offsite wells, theoretical modeling of water level drawdown effects was conducted for the Mountain Vistas project. Using the Pumpit (version 4.2) software package, theoretical distance-drawdown values were calculated based on the results of the final aquifer test in the offsite wells to the west for which RCS previously provided hydrogeologic services. Using those results, values for aquifer parameters were estimated based on the types of geologic materials known to underlie the site, and our experience with those materials. Aquifer parameters estimated for the model were: a conservative transmissivity of approximately 18,000 gallons per day per foot of aquifer width (gpd/ft); a storativity of 0.01 (unitless); a saturated thickness of 100 ft; and an effective porosity of 0.2 (unitless).

Further, as stated above, the November 2004 aquifer test of one of the offsite RCS-designed wells to the west (see Figure 1) was conducted at a rate of approximately 100 gallons per minute (gpm). This is roughly equal to the combined rate at which the proposed Mountain Vistas wells, pumping together, for their typical 8-hour per day operational pumping scenario, will need to pump to meet the estimated average annual residential water demand of approximately 51 acre feet per year for the development.

It is important to note that this entire 51-acre foot per year annual water demand for the Mountain Vistas project can be met by pumping any/all onsite future wells at a combined total pumping rate of 32 gpm. This assumes the wells are pumped 100% of the time; i.e., 24 hour per day, 365 days per year. However, RCS does not recommend that wells should be pumped 100% of the time. Instead, 8 hours of

pumping per day by onsite wells (i.e., a 33¹/₃% operational usage) could readily be used. Such an operational usage means that any/all onsite wells need to be pumped at a combined total rate of approximately 97 gpm (32 gpm ÷ 0.33 operational usage).

Initially, to identify the magnitude of possible drawdown interference, RCS calibrated the theoretical equations used by the model to predict future water level drawdown by simulating a 3-day (72-hour) pumping period in one of the proposed Mountain Vistas wells, pumping continuously at a rate of 100 gpm, and then attempting to reproduce the actual water level drawdown values observed during the pumping test of those offsite wells designed and tested by RCS. Once the simulation was calibrated to the field drawdown value that was actually recorded in the offsite RCS-designed well at the end of that actual pumping test, the known or estimated distances to the offsite wells nearest the proposed location of Mountain Vistas Well B (as shown on Figure 8 in the referenced 2004 RCS report) were assigned. Then, the theoretical amount of water level drawdown at various distances from the proposed Mountain Vistas Well B could be calculated by the model.

Calculations of theoretical water level drawdowns were made for the following periods of continuous pumping at a constant rate of 100 gpm by proposed Well A at Mountain Vistas (see location on Figure 1): 3 days (this was the pumping duration of the actual aquifer test to which the model was calibrated); 5 days, 14 days, 30 days, 90 days, and 180 days. It should be noted that the theoretical pumping periods in the calculations assume that the well is pumping continuously (i.e., 100% of the time) for those periods, that is, 24 hours per day, every day, for the entire period being considered. Such pumping scenarios will not and should not occur.

The theoretically calculated water level drawdown values resulting from these calculations are presented on Table 1, "Theoretical Water Level Drawdown Interference Values.

Table 1 – Theoretical Water Level Drawdown Interference Values

Approximate Distance to Proposed Mountain Vistas Well (ft)	Theoretical Water Level Drawdown (in feet) Showing Assumed Periods of <u>Continuous</u> Pumping at 100 gpm					
	After 3 days	After 5 days	After 14 days	After 30 days	After 90 days	After 180 days
(proposed Mountain Vistas Well B)	Model Calibrated to actual value of 7.2	7.55	8.25	8.78	9.54	10.02
550	0.03	0.09	0.40	0.76	1.37	1.80
850	0	0.01	0.15	0.41	0.94	1.34
1000	0	0	0.07	0.24	0.71	1.08

Whereas the theoretical drawdown calculations are useful in situations where there is a lack of actual pumping test data, it has been our long-term experience in conducting a large number of actual pumping tests that the computer model typically

overestimates the actual amount of water level drawdowns that might occur in nearby non-pumping wells during a field pumping test. This is because the computer model uses the following assumptions:

- The aquifer is homogeneous, isotropic, and of infinite areal extent.
- All wells being evaluated fully penetrate the aquifer systems present.
- Pumping is on a continuous basis (24 hours per day).
- Simulation of drawdown in the aquifer is time dependent. That is, flow to the wells(s) is unsteady and changes with time. Thus, drawdown is considered to be under transient conditions.

Because the above conditions apply to ideal aquifer systems, then there can often be a significant difference between the observed drawdown values in the field and the theoretically-calculated drawdown values predicted by a model. That is, aquifer systems are not ideal. Specifically, in wells at distances similar to those distances for which drawdown values were theoretically predicted above, the actual (observed) water level drawdown during a true pumping (aquifer test) will very likely be less than the theoretically predicted water level drawdown during pumping of the proposed Mountain Vistas Well A.

For example, the model (see Table 1) predicts that a theoretical drawdown of 1.80 ft might occur in an offsite well located 550 ft from the subject property as a result of pumping new onsite Well A at a rate of 100 gpm for a continuous period of 180 days. Such pumping is not proposed, not desired, and not needed for the Mountain Vistas project.

As is known, and as stated above, actual operational pumping of the two proposed onsite wells needs to be at such a combined total rate for only 8 hours per day. During the remainder of each day, water levels in the proposed wells will be allowed to recover. Therefore, it is our opinion that water level drawdown interference caused by the actual 8-hour per day operational pumping of the two proposed onsite Mountain Vistas wells (each pumping at a rate of 50 gpm) will be insignificant, and much less than the model-predicted values listed above on Table 1.

3. Future Pumping (Aquifer) Tests of New Well(s). Following the construction of a new onsite well, a constant rate pumping test will be conducted to permit calculations of certain aquifer parameters and to determine the depth setting and pumping rate for the permanent pump in the new well. To conduct such a pumping test in a new Mountain Vistas well, dual reading flow meters (an instantaneous dial and a totalizer dial) will be installed on the discharge line to permit accurate monitoring of flow rates. Monitoring of water levels in the pumping well will be performed using water level pressure transducers, so that water levels can be monitored on a frequent basis. (Using a water level transducer, water levels could readily be monitored in the new well at one-minute intervals).

In addition, a sample of the groundwater pumped from the new well will be collected and delivered to a State-certified laboratory for analytical testing of County-required constituents. These laboratory test data (such as total dissolved solids, nitrate, sodium, etc.) will represent the background or baseline water quality for the site to which any/all subsequent laboratory testing can be compared. (The wells themselves will be constructed with sanitary seals to depths on the order of 100 ft – 50 ft

minimum is required by the County – and at adequate spacing, as required by the County, from such facilities as corrals, stables, leachfields, etc.).

Also for the proposed pumping test(s), it appears possible to monitor water levels in one or both of the two existing onsite wells, the domestic well and the agricultural well, as shown on Figure 1. However, no driller's log is available for either of these old wells, and therefore, nothing is currently known about the depths of the well casing, or the perforated intervals that exist in the wells. Certain down-well work can be conducted, however, to mitigate these problems in an effort to use one or possibly even both of these wells as additional water level monitoring sites during the proposed pumping test(s). Thus, a video log survey can be performed to document the depths of these older wells and their perforated intervals prior to conducting the pumping test(s). Pressure transducers can readily be installed in these existing onsite wells to monitor water levels during the test(s). Analyses of the aquifer test data will then be performed to determine key aquifer characteristics at the site and to compare to the results of the November 2004 testing by RCS at the property to the west.

We do not recommend the use of privately-owned offsite wells (owned by others) as water level monitoring sites during a pumping test. This is because there are numerous obstacles associated with the field monitoring of water levels in such offsite wells owned by others. Among the obstacles that essentially preclude the use of privately-owned offsite wells as additional monitoring wells during a pumping test of the new well(s) at Mountain Vistas are:

- In order to obtain accurate measurements, the offsite well to be monitored must be shut down a minimum of 24-hours prior to, during, and 24-hours following the constant rate-pumping test. Assuming a 72-hour constant rate test, the offsite well must be completely shut down for 5 full days. This is not realistic if the offsite well serves as the domestic water supply for a nearby residence.
- A transducer and/or water level sounder must be inserted into the offsite well to obtain readings. Even if an offsite well were to have an access port of sufficient size for transducers and/or water level sounders, it is not safe to install an expensive transducer on a wire line into a well that does not have a separate sounding tube. None of these offsite wells, in all likelihood, have been provided with such a sounding tube. The chances are very high that the transducer would become lodged around the pump column if it were to be installed into a well without a sounding tube. Therefore, well head modification would need to take place.
- Site access must be provided by the owners of the offsite wells to enter their property, 24 hours per day during the tests for water level measurement purposes. In our experience, cooperation of offsite well owners is usually limited. More importantly are the tenuous liability issues associated with such access."

In the above discussions provided by Slade & Associates, the average annual water demand is listed as 56 acre-feet (AF) and the average annual residential water demand as 51 acre-feet (AF). The 51 AF is for the residential development and irrigation of onsite landscaping. The 56 AF includes development on the commercial site. Objectives and policies in the Infrastructure Plan of the Mountain Vistas Specific Plan require the applicant to provide a water system that meets the estimated water needs for the proposed development, including both the residential and commercial uses.

Richard Slade & Associates LLC, Consulting Groundwater Geologists, provided the following definition of “cone of depression”:

General Definition of Cone of Depression: Water level drawdown occurs within a well as a result of pumping it. “The water level drawdown extends outside of the well to the surrounding aquifer at depths that decrease as the distance from the well is increased. The lowered water surface is very steep near the well, and the steepness of the surface tends to decrease as distance from the pumping well increases. The lowered water level surface surrounding a pumping well resembles a cone-shaped depression. (Information summarized from “Groundwater and Wells,” by Edward E. Johnson, Inc., 1966).

2. California Department of Fish and Game (Bishop)

Comment 2a: While the information on Swainson’s hawk is generally correct—they have been known to nest in the vicinity of the project site but have not been found on the project site—this does not preclude the potential for them to nest on the project site. The Department believes appropriate nesting surveys should be required to ensure that potential impacts to Swainson’s hawk are less than significant. The Department suggests a mitigation measure for adoption that includes a survey by a qualified biologist of all breeding/nesting habitat on and adjacent to the project site 15 days prior to the start of any development activities if development activities are proposed to begin during the Swainson’s hawk breeding season from April 15th to August 31st.

Response 2a: The Department’s concerns about the Swainson’s hawk will be considered during the decisionmaking process for the project. CEQA requires an analysis of the change in existing conditions that may result from a proposed project. The existing conditions onsite do not include use by hawks although the site does include some large trees that could be suitable for nesting habitat. Those trees may be removed during the development of the site but will be replaced by windbreaks around the site, landscaping along the Highway 6 frontage, landscaping on the commercial parcel, and landscaping on individual parcels. Proposed landscaping includes large trees. Since there is no current hawk use, there is no impact to mitigate.

Although there is no impact to mitigate, in order to minimize the influence of development on hawks in the Chalfant Valley, an additional project enhancement is proposed for the EIR (and for the appropriate standard or policy section of the Mountain Vistas Specific Plan), i.e.:

WR-8 The County and the applicant shall work with DFG and BLM to develop and implement a Swainson’s Hawk habitat enhancement plan in order to minimize the influence of development on the Swainson’s Hawk in the Chalfant Valley. The plan shall identify suitable public lands in the Chalfant Valley, away from current and proposed development areas, where trees may be planted to provide additional nesting sites for Swainson’s Hawks. The plan shall include the size and species of tree to be planted and include a mechanism for maintenance of the trees until they are self-sustaining. The plan shall be completed prior to approval of the final tract map and shall include a condition that the trees be

planted during Phase I of the Mountain Vistas construction.

Comment 2b: The Department has concerns regarding the adequacy of the analysis of the potential impacts of increased groundwater pumping on springs and wetlands and wetland dependent species at Fish Slough. The Department states that Mono County "should complete both an individual and cumulative impact analysis to determine the level of potential impacts to Fish Slough by the project and to allow the adoption of appropriate mitigation measures if required to reduce impacts."

Response 2b: See Response 1c.

Comment 2c: The Department has concerns with the adequacy of the analysis of potential impacts to water resources, particularly groundwater, and does not feel that the proposed mitigation is adequate. The Department states that the County has deferred impact analysis by requiring future studies and stating that based on the results of the future studies, the project may be revised. The Department refers specifically to proposed mitigation measures WR-1, WR-2, and WR-3 that require further study of the potential effects of the proposed septic system on the underlying aquifer, additional study of the potential impacts to off-site wells, and an analysis of the potential impacts of longterm water usage by the development.

Response 2c: Response 1d discusses many of the issues regarding impacts to offsite wells. That analysis concludes that the drawdown effects, if any, on nearby wells will be insignificant. That issue was analyzed in the DEIR; the information provided by Richard Slade & Associates, LLC, Consulting Groundwater Geologists, for the FEIR is intended to clarify and further explain the information presented in the DEIR. The analysis of potential impacts to off-site wells has not been deferred but is addressed in both the DEIR and the FEIR. Proposed mitigation measure WR-1 (see below) is intended to provide additional information on possible impacts to the aquifer prior to approval of the Final Tract Map for the project.

WR-1 To ensure that the proposed water system avoids impacts to surrounding wells and to the surrounding environment (Mountain Vistas Specific Plan Policy 8-C) and to better define the actual amounts, if any, of the possible drawdown impacts on off-site wells that may be caused by pumping of the new on-site wells, a maximum 72-hour pumping test shall be designed and conducted in the first new on-site well. Off-site wells shall be monitored during and after the pump test. The pump test data shall also be used to assess possible impacts to the aquifer. Following completion of the pump test, the engineer shall generate a cone of depression showing the distance at which wells could be affected by pumping at the project site. The pump test shall be completed and the data analyzed prior to approval of the Final Tract Map (Mountain Vistas Specific Plan Conservation Standard CS-34).

Dennis Lampson, the Mono County Environmental Health Director, has indicated that " health standards for residential onsite sewage disposal systems require an overall density of no more than two equivalent dwelling units (EDU's) per acre for projects that are served by a public water system and that meet the California Regional Water Quality Control Board - Lahontan Region minimum

siting criteria for density for onsite sewage disposal systems.” The density for the proposed project does not exceed the two EDU standard.

Proposed Mitigation Measure WR-2 has been amended as follows to address DWP’s concerns (additions are shown in ***bold and italic print***, deletions are shown in ~~strike through print~~):

WR-2 Prior to approval of the Final Tract Map, the Water Well Feasibility and Siting Study shall be revised to ~~include an assessment of the potential impact(s) of the septic systems on the underlying aquifer and to~~ address the potential impacts of discharging 56 acre-feet from the site for 10 years (Mountain Vistas Specific Plan Conservation Standard CS-35).

Proposed Mitigation Measure WR-3 has been amended as follows to address the DWP’s concerns (additions are shown in ***bold and italic print***):

WR-3 If the pump test or the revised Water Well Study indicates that there will be significant impacts to the underlying aquifer or to surrounding existing wells, either in the short-term or the long-term, the Final Tract Map shall not be approved until the project is revised ***and additional CEQA analysis is prepared*** (Mountain Vistas Specific Plan Conservation Standard CS-36).

3. California Department of Transportation (Bishop)

Comment 3a. The Department finds the “Mono Alternative”, Exhibit 5C, to be the preferable off-site access improvement alternative, since it:
“creates an aligned four-way intersection, thereby eliminating two ‘T’ intersections. ...The awkward and potentially unsafe situation for slow moving traffic to quickly weave across lanes to cross the highway utilizing the two ‘T’s would also be eliminated by a four-way intersection.”

Response 3a: This comment will be considered during the decisionmaking process on the project.

Comment 3b: The Department provides information concerning design details of the off-site access improvements and states that the applicant would only be responsible for improvements on the west side of the highway.

Response 3b: This comment is noted.

Comment 3c: Both metric and U.S. standard units are used on plan sheets; it would be more convenient if all U.S. standard units were used.

Response 3c: The plan sheets have been revised to use only U.S. standard units.

Comment 3d. The comment notes a number of requirements that may pertain to the project, i.e.:

1. A power pole located on the west side of Highway 6 may need to be relocated if a four-way intersection is constructed.

2. The landscaping treatment on the berm along US 6 must be maintained so it does not encroach in the State right-of-way.
3. If errant vehicles can reach the proposed propane tanks, appropriate shielding should be provided. Relocation of the tanks should be considered.
4. No direct highway access will be allowed to the commercial lot. To control access along the US 6 frontage, Caltrans will require curb/gutter or another appropriate treatment. If an alternative is chosen that includes both Chalfant Road and Klamath Trail/Brown Subdivision Road, Caltrans will require sidewalk along the commercial frontage.
5. Any runoff exceeding existing conditions will not be allowed on the State right-of-way. A final drainage plan based on the chosen alternative will need to be reviewed and approved by Caltrans.
6. The County should consider the formal waiver of access rights to US 6 as a Condition of Approval for the final map, as appropriate.
7. Caltrans encroachment permits will be required.

Response 3d:

1. The information concerning the power pole is noted.
2. The following mitigation measure has been added to the visual resource section of the EIR:
VR-16 The landscaping treatment on the berm along US 6 shall be maintained so it does not encroach in the State right-of-way.
3. Three alternatives related to the safety of the propane tanks will be considered during the decisionmaking process on the Specific Plan and DEIR:
 - a. Undergrounding of the tanks;
 - b. Installing an aesthetically pleasing barrier system (low walls, berms); or
 - c. Relocation of the propane tanks, potentially to the park area.
4. The existing mitigation measure in the DEIR (and corresponding policy in the Specific Plan) has been amended as follows to clarify that no direct access will be allowed to the commercial lot (deletions are indicated by ~~striketrough~~ print, additions are indicated by ***bold and italic*** print):

C-3 ~~Prohibit~~ Direct access from Hwy. 6 to the commercial lot ***shall be prohibited*** (Mountain Vistas Specific Plan Circulation Policy 5-C).

The circulation alternative map sheets have been amended to indicate the requirement for sidewalk along the commercial frontage between Chalfant Road and Klamath Trail/Brown Subdivision Road.

5. The project has been designed to contain any runoff exceeding existing conditions on-site. The final drainage plan required before final tract map approval will be available for review by Caltrans.
6. The County will consider the formal waiver of access rights to US 6 as a Condition of Approval for the final map depending on the circulation alternative chosen and if that is determined to be appropriate.
7. Mitigation Measure C-2 (in the Circulation Section of the DEIR) requires the applicant to obtain an encroachment permit from Caltrans, i.e.:

C-2 An encroachment permit shall be obtained from Caltrans prior to approval of the final tract map (Mountain Vistas Specific Plan Circulation Program 5-B).

4. Great Basin Unified Air Pollution Control District (Bishop)

Comment 4a: The Mountain Vistas Specific Plan will be subject to the District's Secondary Source Permitting requirements (Rule 216).

Response 4a: This requirement is noted in the DEIR, in the Air Quality Mitigation Monitoring section.

Comment 4b: The District is primarily concerned with the potential for fugitive dust caused nuisance violations, i.e.:

"The District is particularly concerned that large land areas will be stripped, and left barren of their protective vegetation, making them susceptible to wind blown fugitive dust. The application of water is considered only a temporary dust control measure. If construction is suspended for any length of time, it is vital that vegetation be immediately planted to hold the soil in place. Ideally, we recommend that all parcels be left in their natural state until ready for actual development."

The District suggests a number of additional dust mitigation measures for inclusion in the EIR, i.e.:

1. All material excavated or graded is sufficiently watered to prevent excessive amounts of dust. Watering should occur at least twice daily with complete coverage.
2. The planting of wind break trees should be established as soon as possible.
3. All clearing, grading, earth moving, or excavation activities should cease during periods of high winds (i.e greater than 25 miles per hour averaged over one hour).
4. Adjoining streets should be washed or swept clean of tracked-out vehicle dirt.
5. All material transported on-site or off-site should be sufficiently watered or securely covered to prevent excessive amounts of dust.
6. All trucks hauling excavated or graded material off-site should comply with State Vehicle Code Section 23114 (which contains requirements for covering loads so materials do not blow or fall from a truck).

Response 4b: Existing mitigation measures in the DEIR (and corresponding standards and policies in the Specific Plan) have been amended as follows (deletions are indicated by ~~striketrough~~ print, additions are indicated by ***bold and italic*** print):

AQ-7 Dust generated during construction shall be controlled by the use of watering or other Best Management Practices. ***All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice daily with complete coverage*** (Mountain Vistas Specific Plan Conservation Standard CS-16).

AQ-10 The project proponent shall plant a windbreak along the northern and southern perimeters of the project site in order to reduce dust and windborne erosion over the life of the project. ***The windbreak shall be planted as soon as possible following the installation of the well(s) and water system and either before or concurrently with the first phase of residential development.*** An easement for this windbreak shall be included on the final tract map for the project. The windbreak shall also be included on the final Landscape Plan for the project and its ongoing existence and maintenance shall be addressed in the CC & Rs for the project (Mountain Vistas Specific Plan Conservation Standard CS-19).

The following mitigation measures have been added to the DEIR (and corresponding standards and policies in the Specific Plan):

AQ-12 All clearing, grading, earth moving, or excavation activities shall cease during periods of high winds (i.e greater than 25 miles per hour averaged over one hour).

AQ-13 Adjoining streets shall be washed or swept clean of tracked-out vehicle dirt.

AQ-14 All material transported on-site or off-site shall be sufficiently watered or securely covered to prevent excessive amounts of dust.

AQ-15 All trucks hauling excavated or graded material off-site shall comply with State Vehicle Code Section 23114 (which contains requirements for covering loads so materials do not blow or fall from a truck).

5. Los Angeles Department of Water and Power (Bishop)

Comment 5a: The comment requests further clarification on the drainage easement between lots 32 and 33. What facilities are planned for the easement and how will it impact adjacent LADWP property?

Response 5a: The drainage easement between lots 32 and 33 leads from one of the well sites (Parcel "C") to the on-site drainage system that flows in swales along the road frontages to the on-site stormwater retention pond. No improvements are planned for the easement. It will not impact adjacent LADWP property because it will be sloped to flow in an easterly direction, away from Well Site C and the LADWP property.

Comment 5b: The Department is concerned about the impact to its adjacent property from the equestrian easement on the western lots, particularly the equestrian easement between lots 37 and 38 intended to access LADWP property. The comment notes that there is no guarantee that the LADWP property will always be accessible for recreational uses.

Response 5b: The equestrian overlay lots are all adjacent to LADWP property except for Lot 38 which has an access easement across Lot 37 to the western property boundary. Property owners will be informed that access to adjacent LADWP lands is not guaranteed. The BLM also expressed a concern about recreational use of adjacent lands and potential impacts from that use and suggested a mitigation measure to address that concern (see Comment 1a and Response 1a). The proposed mitigation has been added to the EIR and requires the project proponent to work with LADWP and BLM to identify one authorized trail/route from the property to LADWP and BLM lands.

6. Geri Bassett (Chalfant)

Comment 6a: The comment questions the last bullet in the "Purpose Statement" that states that one of the specific project objectives is:

"Providing additional infill development along Hwy. 6, at a greater single-family density, in order to help develop a "Main Street" along Hwy. 6 through the community of Chalfant."

- The proposed development will not achieve this goal and this goal is not in the current General Plan for Chalfant and was not proposed at the General Plan Amendment meetings.
- Response 6a: These comments will be considered during the decisionmaking process. State planning law requires Specific Plans to include project-specific objectives. The "Purpose Statement" in the DEIR, including the above quoted section, was developed to describe the specific objectives of the Mountain Vistas Specific Plan.
- Comment 6b: The comment questions whether the project will preserve the rural character and setting of Chalfant and suggests that some of the lots should be sold as bare land so homeowners could build individual houses.
- Response 6b: The comment pertaining to preserving the rural character of Chalfant will be considered during the decisionmaking process. The project has been revised to allow the developer to install some stick-built housing as well as factory-built housing, and to sell some vacant lots. All housing installed or built on-site will be subject to the design standards in the Specific Plan. In the following mitigation measure, additions are indicated in ***bold and italic print***, deletions are indicated in ~~striketrough print~~.
- VR-4 ~~The housing installed by~~ Workforce Homebuilders LLC shall ***install factory-built housing on at least 50 percent of the lots they develop***. The factory built housing installed on-site ***shall be installed*** on an engineered load bearing foundation system on top of a concrete footing. There shall be at least 3 floor plans available and at least 2 exterior elevations per floor plan. ***Workforce Homebuilders LLC may build stick built housing or sell vacant lots on up to 50 percent of the lots they develop***. (Mountain Vistas Specific Plan Design Standard DS-12).
- Comment 6c: How is the required 65 percent xeriscaping going to be achieved given how much lawn is shown in the housing prototype figures and how will the landscaping requirement be enforced once the property is sold?
- Response 6c: The figures showing the housing prototypes are meant to show the type of housing that will be installed on the parcels, not the landscaping. Design Standard (DS) 27 and Conservation Standard (CS) 39 in the Mountain Vistas Specific Plan address landscaping on individual lots and provide guidance on how that landscaping should occur and what plants may be appropriate. The requirement for xeriscapic landscaping on individual residential lots will be reiterated in the CC & Rs for the project so homeowners are aware of the requirement. The requirement will be enforced by Mono County.
- Comment 6d: The comment addresses the need for affordable housing and states that supplying only two units out of the 47 proposed units as affordable housing is not "a percentage worth considering".
- Response 6d: These comments will be considered during the decisionmaking process.
- Comment 6e: The animal standards should be the same as for existing housing areas. Otherwise, there will be more enforcement issues and complaints about animals.

Response 6e: The animal standards are the same as for existing residential development. The Equestrian Overlay is also basically the same except that homeowners at Mountain Vistas are limited to one horse or large animal per parcel on those parcels with the Equestrian Overlay designation. The Mono County Code Enforcement Officer will have a copy of the requirements for the Equestrian Overlay parcels and those requirements will be reiterated in the CC &Rs for the development so there should be no confusion about animal requirements within the development.

Comment 6f: Who will be responsible for maintenance of the onsite infrastructure and landscaping if the homeowners association does not follow through on its obligations?

Response 6f: The homeowners association will be responsible for maintenance of the onsite landscaping other than the landscaping on individual lots. A mutual water company will be created for the maintenance and operation of the water system and infrastructure. The County will establish a County Service Area Zone of Benefit to provide longterm ongoing maintenance of the roads, storm water system, and retention basin/park. The following mitigation measure has been added to the EIR to address onsite maintenance:

PS-6 The County shall establish a County Service Area Zone of Benefit to provide longterm maintenance of the following onsite infrastructure: roads, storm water system and retention basin/park and may, at some point in the future, also provide for water service.

Comment 6g: Are there other wildlife impacts that need analysis along the Highway 6 corridor, such as impacts to Fish Slough?

Response 6g: See the prior comments and responses in the letters from the BLM and DFG pertaining to potential impacts to Fish Slough. No other wildlife impacts resulting from the project were identified by the DFG, during research in pertinent documents, or in research in the California Natural Diversity Database.

Comment 6h: There should be more current information about the status of the groundwater aquifer before a development of this size is approved. The EIR references reports from 1983, 1979, and 2001.

Response 6h: A site-specific water study was prepared for the project by Richard Slade and Associates (Water Well Feasibility and Siting Study, Proposed Specific Plan Area, Chalfant Valley Area, Mono County, California). Additional review of the Water Well Feasibility Study was prepared by AMEC Earth and Environmental Inc.. Both of those reports are included in Appendix B of the Mountain Vistas Specific Plan and Environmental Impact Report. As required by CEQA, those studies address the potential impacts of the project on the water resources in the area. Recent studies of the overall groundwater system in the Tri-Valley area were consulted during the preparation of the Water Well Feasibility Study (Preliminary Data Collection and Hydrologic Models for the US Filter Tri-Valley Surplus Groundwater Program Mono County, California: MHA Environmental Consulting Inc. et. al., 2001). The older references in the EIR are from the text of

the Mono County MEA and provide more general information on the water resources in the area. Additional information concerning the groundwater in the area was provided by Slade for this FEIR and is included in Responses 1c and 1d.

Comment 6i: The project estimates a 25 percent increase in the population of Chalfant but there is no way to ensure that there will be a corresponding increase in the number of people willing to serve on the Fire Department or as emergency medical personnel. Contributing a fair share towards the cost of additional equipment and facilities does not address the issue of extra personnel or long-term impacts to emergency services.

Response 6i: The potential impacts of the development on fire protection and emergency medical services in Chalfant were considered in the Public Services section of the DEIR. The analysis in that section of the DEIR resulted in the conclusion that:

“The project will result in potentially significant impacts to schools, police services, and fire and emergency medical services; with mitigation those impacts will be reduced to less than significant levels. The proposed mitigation measures have been incorporated into the Specific Plan as standards and policies. The project will not result in significant impacts to other public services; no mitigation measures are proposed for other public services.”

Mitigation measures are included in the DEIR that address fire protection and EMT services. The Chalfant Valley Fire Protection District was consulted about this project and indicated that it has concerns about development in Chalfant in general and that it is in the process of trying to plan for new development in Chalfant and to assess what it needs in terms of equipment, facilities, and personnel to serve the projected development for Chalfant.

Comment 6j: At a 2004 RPAC meeting, Rich McAteer indicated that the County and the ESUSD had not done the necessary paperwork to increase the school impact fees to keep up with current needs. Has this been resolved? If not, the school fees should be increased for this development.

Response 6j: The Eastern Sierra Unified School District (ESUSD) has indicated that there may be a potential need to increase school impact fees in Chalfant but that Chalfant is the only community within the district where that is the case. The ESUSD covers all areas of the County other than Mammoth Lakes and Long Valley. The District cannot justify raising its school impact fees if only one community needs that increase.

High school students from Chalfant go to school in Bishop because there is no comprehensive ESUSD high school close enough for them to attend. The ESUSD operates a small, specialized high school in Benton, the High Desert Academy, which serves approximately 10 students. The ESUSD owns a bus and pays a driver to drive high school students to Bishop. The State ADA funds for those students go to the high school in Bishop.

Elementary-aged students who live in Chalfant are within the jurisdiction of Edna Beaman Elementary in Benton. To attend school in Bishop, elementary-

aged students must get an interdistrict transfer approved by the ESUSD. The State ADA funds for those students go to the elementary school in Bishop.

The District also indicated that it will be applying for state funds for land acquisition and school development in Chalfant. The current plan is to acquire 40 acres, probably BLM land, to build an elementary school, middle school, and high school. The development of the schools would be a gradual process, timed to coincide with growth in Chalfant and the development of a population base for the schools.

(Information on the ESUSD was provided by Molly Nugent, ESUSD, in a conversation with Keith Hartstrom, Mono County Principal Planner.)

Mark Geyer, the Superintendent of the Bishop Joint Union High School District and the Bishop Union Elementary School District, has indicated that impacts to the school districts from the proposed development would be minimal.

Comment 6k: The comment letter prefers Development Alternative B—Reduced Development, 26 one-acre lots and Circulation Alternative 5B. The letter also states that the recreation impact fees should go to improving the existing park rather than adding an additional park.

Response 6k: These comments will be considered during the decisionmaking process for the project.

7. Daniel and Yvonne Froiland (Chalfant)

Comment 7a: The comment expresses concern about the amount of development planned and its impact on groundwater in the area.

Response 7a: A site-specific water study was prepared for the project by Richard Slade and Associates (Water Well Feasibility and Siting Study, Proposed Specific Plan Area, Chalfant Valley Area, Mono County, California). Additional review of the Water Well Feasibility Study was prepared by AMEC Earth and Environmental Inc.. Both of those reports are included in Appendix B of the Mountain Vistas Specific Plan and Environmental Impact Report. As required by CEQA, those studies address the potential impacts of the project on the water resources in the area. Recent studies of the overall groundwater system in the Tri-Valley area were consulted during the preparation of the Water Well Feasibility Study (Preliminary Data Collection and Hydrologic Models for the US Filter Tri-Valley Surplus Groundwater Program Mono County, California: MHA Environmental Consulting Inc. et. al., 2001). Additional information concerning the groundwater in the area was provided by Slade for this FEIR and is included in Responses 1c and 1d.

Comment 7b: The comment also addresses the possibility of contamination of well water from the proposed septic systems.

Response 7b: Dennis Lampson, the Mono County Environmental Health Director, has indicated that “ health standards for residential onsite sewage disposal systems

require an overall density of no more than two equivalent dwelling units (EDU's) per acre for projects that are served by a public water system and that meet the California Regional Water Quality Control Board - Lahontan Region minimum siting criteria for density for onsite sewage disposal systems." The density for the proposed project does not exceed the two EDU standard.

8. Mike McWilliams (White Mountain Estates)

Comment 8a: The comment discusses traffic speeds on Highway 6 in Chalfant and the need for safety improvements along Highway 6 in Chalfant and suggests a reduced speed limit through the community.

Response 8a: Traffic speeds on state highways are determined by Caltrans. Mono County, the Local Transportation Commission, and Caltrans are aware of the safety concerns regarding access to and from Highway 6 in Chalfant and are working together to develop and implement safety improvements, including acceleration and deceleration lanes. The off-site traffic improvement alternatives for the Mountain Vistas Specific Plan are intended to address these safety issues as they relate to the Mountain Vistas project.

Most of the proposed safety enhancements for Chalfant address vehicular safety as cars enter and exit the highway. The existing mitigation measure in the DEIR (and the corresponding policy in the circulation section of the Specific Plan) that addresses pedestrian safety in Chalfant has been amended as follows (deletions are indicated in ~~striketrough~~ print, additions are indicated in ***bold and italic*** print):

C-5 ***The County, the applicant, and the community shall*** work with Caltrans to provide ~~as safe as~~ ***the safest feasible*** crossing of Highway 6 from the commercial lot to commercial and community facilities on the east side of Highway 6 in Chalfant. ~~A safe as feasible~~ ***Such a*** crossing shall be ~~established~~ ***completed*** within one year of the completion of housing on the project site (Mountain Vistas Specific Plan Circulation Program 6-B). ***Options for a safe pedestrian crossing include:***

- a. ***A crosswalk with flashing lights.***
- b. ***A roundabout on Highway 6 with pedestrian crossings;***
- c. ***An underpass under Highway 6; or***
- d. ***A four-way stop at the intersection of Highway 6 and Brown Subdivision Road.***

Comment 8b: The comment also addresses affordable housing and suggests that:

"some developments might lend themselves to a higher density of affordable homes than others. It seems to me that Mountain Vistas is such a development by virtue of its location close to the highway and to the existing community."

The comment then addresses the County's requirement for one deed restricted home in a development of 50 homes and wonders if:

“the requirement might be changed in the future to allow the proponent the option of smaller lots and less costly units with the express objective of providing much needed low cost housing.”

Response 8b: The County is working on methods of providing additional low cost housing, including changes to its development regulations to allow higher densities where appropriate. Some of the alternative development scenarios for the Mountain Vistas Specific Plan included in the DEIR focus on concentrated development with smaller lot sizes.

9. Margaret Miller (Chalfant)

Comment 9a: The General Plan requirement is for one-acre parcels on the project site.

Response 9a: The current General Plan land use designation for the parcel is Estate Residential (ER) which has a one-acre minimum lot size. A General Plan Amendment to allow smaller lots on the parcel has been proposed for reasons discussed in the DEIR, i.e.:

“Tri-Valley Area Plan policies currently require gross densities for residential development in Chalfant not to exceed one dwelling unit per acre. The site and the project have been analyzed and a smaller lot size was determined to be appropriate for the site because the project site is adjacent to existing roads and highways and it is adjacent to the existing community of Chalfant which has several areas with ½ acre or smaller lots. Smaller lot sizes would also allow more houses to be built in an area adjacent to Chalfant in order to preserve agricultural lands elsewhere in the area.

The proposed development appears to be consistent with the existing development in Chalfant that is ½ acre or smaller in size. Of the 164 lots designated RMH in Chalfant, 99 lots (60 %) are 0.5 acres or less, 13 lots (8 %) are 0.5 to 1 acre, and 57 lots (32 %) are 1 acre or more.

Outside of community areas in Mono County, a one-acre lot size has generally been established because that is the smallest size lot that can accommodate both an individual well and an individual septic system. The Chalfant Valley Fire Protection District required a water system for the proposed development; that requirement allows smaller lot sizes to be developed.”

The proposed General Plan Amendment would apply only to the subject parcel, not to any other parcels in Chalfant.

Comment 9b: The comment questions the adequacy of the water study, whether the high-density housing will contaminate existing wells, and whether the project proponent is going to install a complete community water system.

Response 9b: A site-specific water study was prepared for the project by Richard Slade and Associates (Water Well Feasibility and Siting Study, Proposed Specific Plan Area, Chalfant Valley Area, Mono County, California). Additional review of the Water Well Feasibility Study was prepared by AMEC Earth and Environmental Inc.. Both of those reports are included in Appendix B of the Mountain Vistas Specific Plan and Environmental Impact Report. As required by CEQA, those studies

address the potential impacts of the project on the water resources in the area. Recent studies of the overall groundwater system in the Tri-Valley area were consulted during the preparation of the Water Well Feasibility Study (Preliminary Data Collection and Hydrologic Models for the US Filter Tri-Valley Surplus Groundwater Program Mono County, California: MHA Environmental Consulting Inc. et. al., 2001). Additional information concerning the groundwater in the area was provided by Slade for this FEIR and is included in Responses 1c and 1d.

Dennis Lampson, the Mono County Environmental Health Director, has indicated that “ health standards for residential onsite sewage disposal systems require an overall density of no more than two equivalent dwelling units (EDU’s) per acre for projects that are served by a public water system and that meet the California Regional Water Quality Control Board - Lahontan Region minimum siting criteria for density for onsite sewage disposal systems.” The density for the proposed project does not exceed the two EDU standard.

The project proponent is planning to install a community water system [well(s) and water distribution system] for the Mountain Vistas subdivision. The water system would not extend into other areas of the community.

Comment 9c: The comment asks about the size and location of the propane tanks, about precautions against leaks and explosions, and why the development is using communal propane tanks instead of individual tanks.

Response 9c: The location and details about the proposed propane tank storage location are shown on the Master Utility Plan—Dry Utilities, Figure 8 in Appendix A, Map Set, of the Mountain Vistas Specific Plan and DEIR. The proposed storage area includes four 1,000 gallon tanks, each approximately 16 feet long, 3.5 feet wide, and 4.5 feet high. The proposed location for the tanks is adjacent to the Highway 6 right-of-way, north of the commercial lot. The tanks will be managed with standard safety procedures to ensure against leaks and explosions. The applicant is proposing communal tanks for safety and aesthetic reasons. The Chalfant Valley Fire District indicated that communal tanks would be preferable for fire safety reasons and the applicant felt that communal tanks would also be preferable aesthetically.

Comment 9d: The roads need to be sized appropriately to accommodate emergency vehicles.

Response 9d: All roads and cul-de-sacs on-site have been designed to Mono County Road Standards and Firesafe Standards to ensure adequate access and turnaround for emergency vehicles.

Comment 9e: What provisions have been made to address additional impacts on public services (sheriff, traffic to transfer station, phone lines, social services, mail delivery, animal control, fire protection and EMTs)?

Response 9e: Potential impacts to public services and social services are discussed in the Public Services section of the DEIR. The analysis in that section of the DEIR resulted in the conclusion that:

“The project will result in potentially significant impacts to schools, police services, and fire and emergency medical services; with mitigation those impacts will be reduced to less than significant levels. The proposed mitigation measures have been incorporated into the Specific Plan as standards and policies. The project will not result in significant impacts to other public services; no mitigation measures are proposed for other public services.”

10. Janet Perry (Chalfant)

Comment 10a: The comment contains a number of points that address development in the Chalfant Valley community in general. Only comments that pertain to the Mountain Vistas Specific Plan are addressed here.

Response 10a: No response required.

Comment 10b: The comment addresses a number of points pertaining to the design of the Mountain Vistas subdivision, i.e.:

1. Parcels should be no smaller than one acre.
2. There should not be manufactured homes on all the lots.
3. The development should fit into the existing environment and not look like a subdivision.
4. Livestock should be encouraged.
5. There should be an underground pedestrian/equestrian access under Highway 6.

Response 10b: Comments pertaining to the design of the project will be considered during the decisionmaking process.

Comment 10c: There needs to be a complete study of the aquifer.

Response 10c: A site-specific water study was prepared for the project by Richard Slade and Associates (Water Well Feasibility and Siting Study, Proposed Specific Plan Area, Chalfant Valley Area, Mono County, California). Additional review of the Water Well Feasibility Study was prepared by AMEC Earth and Environmental Inc.. Both of those reports are included in Appendix B of the Mountain Vistas Specific Plan and Environmental Impact Report. As required by CEQA, those studies address the potential impacts of the project on the water resources in the area. Recent studies of the overall groundwater system in the Tri-Valley area were consulted during the preparation of the Water Well Feasibility Study (Preliminary Data Collection and Hydrologic Models for the US Filter Tri-Valley Surplus Groundwater Program Mono County, California: MHA Environmental Consulting Inc. et. al., 2001). Additional information concerning the groundwater in the area was provided by Slade for this FEIR and is included in Responses 1c and 1d.

Comment 10d: There is not presently enough fire protection/EMT coverage in Chalfant.

Response 10d: The potential impacts of the development on fire protection and emergency medical services in Chalfant were considered in the Public Services section of the DEIR. The analysis in that section of the DEIR resulted in the conclusion that:

“The project will result in potentially significant impacts to schools, police services, and fire and emergency medical services; with mitigation those impacts will be reduced to less than significant levels. The proposed mitigation measures have been incorporated into the Specific Plan as standards and policies. The project will not result in significant impacts to other public services; no mitigation measures are proposed for other public services.”

Mitigation measures are included in the DEIR that address fire protection and EMT services. The Chalfant Valley Fire Protection District has indicated that it has concerns about development in Chalfant in general and that it is in the process of trying to plan for new development in Chalfant and to assess what it needs in terms of equipment, facilities, and personnel to serve the projected development for Chalfant.

Comment 10e: Is a potential increase in crime addressed?

Response 10e: The potential impacts to law enforcement services were considered in the Public Services section of the DEIR. As noted above, the analysis in the DEIR resulted in the conclusion that the project will result in potentially significant impacts to police services (primarily from additional traffic accidents and a larger area to patrol; to a much less degree from additional crime); with mitigation those impacts will be reduced to less than significant levels. The DEIR includes a mitigation measure that addresses law enforcement services.

Comment 10f: Additional school monies should be used to improve the Benton school—building a school in Chalfant would hurt the ADA in Benton. Parents from Chalfant south should be allowed to choose between the schools in Benton and Bishop.

Response 10f: These comments will be considered during the decisionmaking process.

11. Stephen and Dee Reish (Chalfant)

Comment 11a: Roads into the development need to provide access for emergency vehicles.

Response 11a: All roads and cul-de-sacs into and within the development have been designed in compliance with Mono County Road Standards and Firesafe Standards to provide adequate access and turnaround areas for emergency vehicles.

Comment 11b: One-acre parcels are necessary to prevent soil saturation from sewage and possible groundwater contamination.

Response 11b: Dennis Lampson, the Mono County Environmental Health Director, has indicated that “health standards for residential onsite sewage disposal systems require an overall density of no more than two equivalent dwelling units (EDU’s) per acre for projects that are served by a public water system and that meet the California Regional Water Quality Control Board - Lahontan Region minimum siting criteria for density for onsite sewage disposal systems.” The density for the proposed project does not exceed the two EDU standard.

Comment 11c: Additional study of the aquifer in the area is necessary before additional development occurs.

Response 11c: See Response 10c.

12. Don and Annette Sebastian (Chalfant)

Comment 12a: One-acre lots have been recommended in the past by the RPAC for all new development in Chalfant. Smaller size lots will hasten septic contamination of the groundwater supply.

Response 12a: See Response 11b.

Comment 12b: The developer has presented only one plan.

Response 12b: The Mountain Vistas Specific Plan and DEIR contains the proposed project and six alternative development scenarios. These alternatives include:

Alternative A	No Project Alternative;
Alternative B	Reduced Development—26 One-Acre Lots;
Alternative C	Reduced Development—18 One-Acre Lots;
Alternative D	Reduced Development—34 Half-Acre Lots;
Alternative E	Clustered Development—48 Lots; and
Alternative F	Alternative Access—49 Lots.

Comment 12c: The central gas tanks are not safe.

Response 12c: The tanks will be managed with standard safety procedures to ensure against leaks and explosions. The applicant is proposing communal tanks for safety and aesthetic reasons. The Chalfant Valley Fire District indicated that communal tanks would be preferable for fire safety reasons and the applicant felt that communal tanks would also be preferable aesthetically.

Other comment letters have stated that due to the proposed location of the tanks in an area adjacent to Highway 6, the tanks may not be safe if errant vehicles can reach the proposed propane tanks. Three alternatives related to the safety of the propane tanks will be considered during the decisionmaking process on the Specific Plan and DEIR:

- a. Undergrounding of the tanks;
- b. Installing an aesthetically pleasing barrier system (low walls, berms); or
- c. Relocation of the propane tanks, potentially to the on-site park area.

APPENDIX A

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APPENDIX B

Comment Letters from:

- 1. Bureau of Land Management (Bishop)**
- 2. California Department of Fish and Game (Bishop)**
- 3. California Department of Transportation, District 9 (Bishop)**
- 4. Great Basin Unified Air Pollution Control District (Bishop)**
- 5. Los Angeles Department of Water and Power (Bishop)**
- 6. Gerry Bassett (Chalfant)**
- 7. Daniel and Yvonne Froiland (Chalfant)**
- 8. Mike McWilliams (White Mountain Estates)**
- 9. Margaret Miller (Chalfant)**
- 10. Janet Perry (Chalfant)**
- 11. Stephen and Dee Reish (Chalfant)**
- 12. Don and Annette Sebastian (Chalfant)**